

## REMARKS

### STATUS OF THE CLAIMS

Applicant has amended Claims 15, 19, and 48-51. Claims 15-24 and 48-51 are currently pending. Applicant respectfully requests reconsideration of pending Claims 15-24 and 48-51 in light of the following remarks.

### CLAIM OBJECTIONS

Claims 15 and 19 stand objected to due to informalities. Applicant has amended Claims 15 and 19, as suggested by the Examiner, to provide antecedent basis. Applicant respectfully requests removal of the objection to Claims 15 and 19.

### CLAIM REJECTIONS – 35 U.S.C. § 112

Claim 18 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. The Examiner states that “the third connection location” on line 2 of Claim 18 lacks a positive antecedent basis. However, Claim 15, from which Claim 18 ultimately depends, recites “a third connection location”. Applicant respectfully requests withdrawal of the § 112 rejection of Claim 18.

### CLAIM REJECTIONS – 35 U.S.C. § 112

Claims 15-24 stand rejected under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential elements. The Examiner states that the “omitted elements are: connectors configured to define a fluid relationship between the first fluid treatment module and the second fluid treatment module that is both parallel flow and series flow in the first or second orientation of the first head with respect to the second head.” Accordingly, Applicant has amended Claim 15 to specify “a first connector and a second connector, each being removable and interchangeable, each configured to couple the first fluid treatment module to the second fluid treatment module, the first connector defining a parallel flow configuration, the second connector defining a series flow configuration.” Applicant respectfully requests withdrawal of the § 112 rejection of Claims 15-24.

CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Independent Claim 15

Claims 15-24 and 48-51 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,407,571 issued to Rothwell (“Rothwell”).

Amended Claim 15 specifies “a first connector and a second connector, each of the first and second connectors being removable and interchangeable, and each configured to couple the first fluid treatment module to the second fluid treatment module, the first connector defining a parallel flow configuration, the second connector defining a series flow configuration.”

Rothwell teaches a modular filter assembly including filter units, each having a head 1, a filter element 4, and a filter housing 6. Figure 4 of Rothwell illustrates three filter units A, B, C which are configured for parallel flow with one another. Each of the three filter units A, B, C is positioned in the same orientation. The fourth filter unit D shown in Figure 4 of Rothwell is rotated 180 degrees from the orientation of the first three filter units A, B, C. The third filter unit C is connected for series flow with the fourth filter unit D using a blank 50 (as shown in Figure 4 of Rothwell) positioned between the third filter unit C and the fourth filter unit D. A fifth filter unit E is downstream of the fourth filter unit D and is connected to the fourth filter unit D in series. The fifth filter unit E is rotated 180 degrees from the orientation of the fourth filter unit D to the same position as the first three filter units A, B, C and another blank 50 is used, positioned between the fourth filter unit D and the fifth filter unit E. Rothwell also teaches as follows:

The filter heads in a preferred embodiment are integrally formed of plastic material which allows simple joining of the heads to form the multi-unit assembly of the present invention. The heads are preferably joined in a welding process, for example platen welding or non-contact melt bonding. Alternatively, an adhesive bonding process can be employed. The mounting surfaces to be joined by welding or bonding can also be ring-like projections around the inlet or outlet holes such as short tubes, a ring of plastic material on the hole periphery, etc.. [sic] The mounting surfaces in this case are the outer surfaces of these projections which are abutted in the welding process.

When the filter units comprise plastic material, the entire assembly becomes a readily disposable filter system.

*Rothwell*, col. 4, lines 51-66.

Rothwell only teaches directly connecting modules together without a connector for parallel flow and using planar blanks to connect modules for series flow. In either flow configuration, the connections (*i.e.*, welding or adhesive bonding) between the Rothwell modules are permanent. Rothwell's teachings of welding/bonding modules together and total system disposability teach away from using removeable and interchangeable connectors.

Accordingly, Rothwell fails to teach or suggest "a first connector and a second connector, each being removable and interchangeable, each configured to couple the first fluid treatment module to the second fluid treatment module, the first connector defining a parallel flow configuration, the second connector defining a series flow configuration," as specified by amended Claim 15. Therefore, independent Claim 15 and dependent Claims 16-24 and 48-51 are allowable.

Dependent Claims 16-24 and 48-51

Claims 16-24 and 48-51 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Rothwell. Claims 16-24 and 48-51 depend from Claim 15 and are therefore allowable for the reasons discussed above with respect to Claim 15. Claims 16-24 and 48-51 also specify patentable subject matter not specifically discussed herein.

CONCLUSION

In light of the above, Applicant respectfully requests reconsideration and allowance of Claims 15-24 and 48-51.

Respectfully submitted,

A handwritten signature in black ink, reading "Raye Lynn Daugherty". The signature is written in a cursive, flowing style.

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